

### **REMARKS/ARGUMENTS**

The office action of June 17, 2005 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 35-53 remain in this application. Claims 1-34 were previously canceled.

Claims 35-53 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shibata et al., Dynamic Hypertext and Knowledge Agent Systems for Multimedia Information Networks, ACM 1993, pages 82-93, ("Shibata"), in view of U.S. patent no. 5,557,722 to DeRose et al. ("DeRose"). Applicants respectfully traverse this rejection.

The action alleges that Shibata discloses all the features of independent claim 35, but for selecting one of a plurality of style sheets. Instead, the action submits that Shibata discloses selecting one format from multiple available formats. To overcome the deficiency of Shibata, the action relies on DeRose. In justifying the combination, the action contends that DeRose "indicates that the format characteristics of the elements in a document are equivalent to the style sheets of the elements in a document" and that one skilled in the art would have modified Shibata to select one of a plurality of style sheets.

To show the feature of interrogating the output device to determine a set of capabilities of the output device in response to a request as called for in claim 35, the action relies on pages 82, 83, 86 and 87 of Shibata. In this regard, the action contends on page 3:

the fact that the format of a document is converted by the knowledge agent to adjust to the users workstation capabilities based upon the fact that the knowledge agent receives the user request for a document implies interrogating the output device to determine the capabilities of the output in response to a request for the document since in order to know the capabilities of the user workstation, which is the output device, upon the user request to *adjust the format of the document accordingly*, the knowledge agent must interrogate the user workstation about the capabilities.

(Emphasis original). Applicants respectfully disagree with the action's interpretation of Shibata. Admittedly, as described on page 82 of Shibata, "media formats of the multimedia units stored on different database servers must be converted to adjust to the user's workstation capabilities" which have different video and audio display capabilities. Nonetheless, contrary to the action's assertion that the knowledge agent *must* interrogate the user workstation to determine its

capabilities, the mere fact that the media coordination layer in the knowledge agent converts the media formats of the original multimedia information units stored on the database servers to adjust to the user's workstation capabilities does not lead to such a conclusion. Indeed, Shibata, in not referring to such an interrogation in its description of the knowledge agent and media conversion layer, leads one to a wholly different conclusion. Namely, either the user request contains the information as to the workstation capabilities or the knowledge agent already has the capabilities of the user's workstation stored locally. Seemingly, these methodologies would be a more efficient approach rather than requiring two additional transmissions between the knowledge agent and user's workstation.

In view of the above, applicants submit that Shibata does not teach or suggest interrogating the output device to determine a set of capabilities of the output device in response to a request for the document as recited in claim 35. DeRose fails to remedy this defect. As such, the combination of Shibata and DeRose, even if proper, does not result in the claim 35 combination of features.

Independent claim 42 calls for, among other features, interrogating the output device to determine a set of capabilities of the output device in response to a request for the document; and generating a selected style sheet based upon the set of capabilities of the output device determined by interrogating the output device using the layout generator. Independent claim 48 as amended calls for, among other features, interrogating the output device to determine a set of capabilities of the output device in response to a request for the document; and based upon the set of capabilities of the output device determined by interrogating the output device, generating a style sheet. Thus, for substantially the same reasons as set forth with respect to claim 35, the combination of Shibata and DeRose, even if proper, does not result in the invention of claims 42 and 48.

Claims 36-41, 43-47 and 49-53, which ultimately depend from claims 35, 42 and 48, respectively are patentably distinct from the combination of Shibata and DeRose for the same reasons as their ultimate base claim and further in view of the additional advantageous features recited therein.

**CONCLUSION**

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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